

TROJAN LAW OFFICES
BEVERLY HILLS

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CALIFORNIA EXPANDED METAL
PRODUCTS COMPANY, a California
corporation; and CLARKWESTERN
DIETRICH BUILDING SYSTEMS LLC,
dba CLARKDIETRICH BUILDING
SYSTEMS, an Ohio limited liability
company

Plaintiffs,

v.

JAMES A. KLEIN, an individual;
BLAZEFRAME INDUSTRIES, LTD, a
Washington Company, and SAFTI-
SEAL, INC., a Washington company,

Defendants.

CASE NO. 2:18-cv-00659-JLR

**SUPPLEMENTAL DECLARATION OF R.
JOSEPH TROJAN IN SUPPORT OF
PLAINTIFFS' COMBINED (1) REPLY TO
DEFENDANTS' OPPOSITION TO
PLAINTIFFS' MOTION FOR PARTIAL
SUMMARY JUDGMENT AND (2)
OPPOSITION TO DEFENDANTS' CROSS-
MOTION FOR SUMMARY JUDGMENT**

1 I, R. Joseph Trojan, hereby declare and state that:

2 1. I am an attorney at law, duly licensed to practice law in the State of California and
3 the United States District Court for the Central District of California. I am the owner of Trojan
4 Law Offices, the attorneys of record for Plaintiff California Expanded Metal Products Company
5 (“CEMCO”). I have personal knowledge of the facts stated herein. If called upon to do so, I could
6 and would competently testify that:

7 2. Attached hereto as **Exhibit 17** is a true and correct copy of excerpts from Defendant
8 Safti-Seal’s responses to CEMCO’s interrogatory requests.

9 3. Attached hereto as **Exhibit 18** is a true and correct copy of Defendant Safti-Seal’s
10 responses to CEMCO’s first set of requests for production of documents.

11 4. Attached hereto as **Exhibit 19** is a true and correct copy of a Safti-Seal video from
12 the website: https://www.youtube.com/watch?v=iT_n6chfVuk.

13 5. Attached hereto as **Exhibit 20** is a true and correct copy of a chart compiled by my
14 office with drawings of the accused Safti-Seal products from the Safti-Seal website:
15 <https://www.saftiseal.com>.

16 6. Attached hereto as **Exhibit 21** is a true and correct copy of the “Business
17 Information” regarding Safti-Seal obtained by my office from the Washington Secretary of State
18 Website: <https://ccfs.sos.wa.gov/>.

19 I declare under penalty of perjury under the laws of the United States that the foregoing is
20 true and correct.

21 Executed this 24th day of June, 2019 at Beverly Hills, California.

22
23
24
25
26
27 /s/R. Joseph Trojan
28 R. Joseph Trojan

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of June 2019, I caused to have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

tjl@elamburke.com

thomas@seattlepatentlaw.com

pbageant@hollystonelaw.com

bob@leehayes.com

bodineb@lanepowell.com

JKersting@fbtlaw.com

ASchoen@fbtlaw.com

TROJAN LAW OFFICES

by

/s/ R. Joseph Trojan

R. Joseph Trojan (*pro hac vice*)

9250 Wilshire Blvd.

Beverly Hills, CA

Attorney for Plaintiff,

CALIFORNIA EXPANDED

METAL PRODUCTS COMPANY

TROJAN LAW OFFICES
BEVERLY HILLS